

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

for the

MAR - 4 2016

Southern District of Texas

David J. Bradley, Clerk

United States of America  
v.  
Carlos OYERVIDES (YOB 1975) US

Case No. *M-16-0406-M**Defendant(s)***SEALED**  
**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 26, 2013 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

21 USC 846

Conspiracy to possess with intent to distribute more than 5 kilograms of cocaine

This criminal complaint is based on these facts:

See attached

☐ Continued on the attached sheet.*[Signature]*  
Complainant's signature

Antonio Perez, IV, HSI SA

Printed name and title

Sworn to before me and signed in my presence.

Date:

*March 4, 2016 5:03pm**[Signature]*  
Judge's signature

City and state:

McAllen, Texas

*Peter E Ormsby*  
Printed name and title*U.S. Magistrate Judge*

In October of 2013, U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in McAllen, Texas received information from an HSI confidential informant (CI) regarding a drug trafficking organization (DTO) operating in the Rio Grande Valley area.

The CI identified Carlos OYERVIDES as a member of a drug trafficking organization (DTO) which was responsible for re-distributing narcotics that the organization had stolen from various sources of supply. The CI advised that the DTO coordinated staged narcotics seizures of sham, or diluted, narcotics with the assistance of corrupt law enforcement officials which enabled the organization to steal drug loads from unwitting narcotics sources of supply.

On April 26, 2013, Houston, Texas Police Department (HPD) officers approached a 1996 Mazda MPV near Loma Linda Rd in Houston, Texas that was abandoned in a ditch with the engine still running. HPD officers seized approximately 18 kilograms of cocaine located inside of the aforementioned vehicle. Lab analysis of bundles indicated that they contained less than 1 percent cocaine.

On May 2, 2014, agents conducted an interview with OYERVIDES in which OYERVIDES admitted that he assisted co-conspirators of a drug trafficking organization (DTO) with the aforementioned seizure of cocaine. OYERVIDES stated the seizure of sham cocaine had been staged by the DTO. OYERVIDES stated that the purpose of the seizure was to make the unwitting narcotics source of supply (SOS) believe that the cocaine had been seized by law enforcement which enabled the DTO to steal the drug load and to further re-distribute the real cocaine.

OYERVIDES stated that his role was to arrange for transport of the real cocaine with the SOS. OYERVIDES advised that he then coordinated with a co-conspirator who arranged for the real cocaine to be stolen and a portion cut into sham bundles. Co-conspirators staged a seizure of the sham cocaine by corrupt officers. The real cocaine was then sold for profit.